

# EXHIBIT 11



1 THE COURT REPORTER: Mr. Gamboa, if  
2 you would please raise your right hand, I will  
3 administer the witness's oath to you.

4 THE WITNESS: (Complies.)

5 THE COURT REPORTER: Do you  
6 solemnly swear or affirm that the testimony which  
7 you give in this case will be the truth, the  
8 whole truth, and nothing but the truth, so help  
9 you God?

10 THE WITNESS: I do.

11 THE COURT REPORTER: Thank you.

12 JEREMY GAMBOA,  
13 having sworn to testify the truth, the whole  
14 truth, and nothing but the truth testifies on the  
15 witness's oath as follows:

16 EXAMINATION

17 BY MS. QUINN-BARABANOV:

18 Q. Morning, Mr. Gamboa.

19 A. Good morning.

20 Q. As you have probably become aware over  
21 the past few minutes of getting set up, I am  
22 Jennifer Quinn-Barabanov. I represent Eddystone,  
23 and I am here to ask you some questions this  
24 morning.

25 Have you been deposed before?

1 water-borne logistics?

2 A. No, ma'am. No, ma'am. But there was a  
3 component to our marketing.

4 Q. Okay. So let me -- I said you were not  
5 responsible and the answer, if I am understanding  
6 correctly, yes, you were not responsible; is that  
7 correct?

8 A. No. I was not responsible.

9 Q. Thank you.

10 All right. Then in 2010, you went  
11 on to become the Chief Marketing Officer at  
12 Bridger Group; correct?

13 A. Yes, ma'am.

14 Q. And in that role, did you have any  
15 responsibilities for transportation by rail?

16 A. As Chief Marketing Officer, I honestly  
17 do not remember. I don't remember when we  
18 started our rail movements.

19 Q. All right. What about by ship or --  
20 transportation by ship or barge?

21 A. No, ma'am. Not at that time.

22 Q. All right. And let me go back real  
23 quick just with respect to the Rising Star Crude  
24 Company rail responsibilities.

25 About how much of your time,

1 Q. Okay. Does this refresh your  
2 recollection as to whether or not BTS entered  
3 into this agreement while you were in your role  
4 as the Chief Marketing Officer of Bridger Group?

5 A. Based on the date that Eddystone signed  
6 this, that's correct. I was the Chief Marketing  
7 Officer at that time.

8 Q. Now, before BTS entered into this Rail  
9 Services Agreement, which is sometimes referred  
10 to as "the RSA" -- are you familiar with that  
11 term?

12 A. Yes, ma'am.

13 Q. Okay. Great.

14 Before BTS entered into the RSA,  
15 did you ever visit the Eddystone facility?

16 A. Before we entered into the agreement,  
17 no, ma'am.

18 Q. Yes, sir. All right.

19 Now, the next job that's listed  
20 here from July 2013 to July 2015 is the Executive  
21 Vice President and Chief Operating Officer of  
22 Bridger, LLC; is that correct?

23 A. Yes, ma'am.

24 Q. All right. What was your understanding,  
25 if any, of the relationship between your prior

1 employer, Bridger Group, and your new employer,  
2 Bridger, LLC?

3 A. So at that time, I believe it was around  
4 July 1st, we -- we sold part of the business to  
5 Riverstone Holdings. And at that time, we had a  
6 name change from Bridger Group to Bridger, LLC.

7 THE COURT REPORTER: And at that  
8 time, we had a name change to?

9 THE WITNESS: At that time, when we  
10 took on a private equity partner, we also had a  
11 name change from Bridger Group to Bridger, LLC.

12 Also at that time, the three  
13 founders, our roles changed. Julio Rios became  
14 the CEO; I became the COO; and James Ballengee  
15 became the CMO, Chief Marketing Officer.

16 BY MS. QUINN-BARABANOV:

17 Q. All right. Now, as EVP and CEO, were  
18 you responsible for all operations in business  
19 development?

20 A. Yes, ma'am.

21 Q. And that -- those responsibilities  
22 covered both Bridger, LLC, and subsidiaries;  
23 correct?

24 A. Yes, ma'am.

25 Q. So I want to ask you about the two

1 different titles, the EVP and the COO title.

2 Did the EVP role have any  
3 responsibilities different from your  
4 responsibilities as COO?

5 A. To be honest, I'm not sure what  
6 distinction that initialism would have, as being  
7 different than my COO.

8 Q. All right. So your -- your recollection  
9 is that your -- your responsibilities in both of  
10 those roles were co-extensive? Is that fair?

11 A. I am saying I -- I don't know the  
12 difference.

13 Q. Excellent. Thank you.

14 Now, the time that you were in  
15 this -- and I'm going to refer to it, then, just  
16 for the sake of convenience "in your COO role."  
17 Okay?

18 A. Okay.

19 Q. While you were COO in this time period,  
20 that time overlaps with the period of Eddystone  
21 Operations; correct?

22 A. Yes, ma'am.

23 Q. And it also overlaps for approximately a  
24 year of a supply arrangement between Bridger  
25 Marketing and Monroe; correct?

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

EDDYSTONE RAIL COMPANY, LLC	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No.
	§	17-CV-00495
BRIDGER LOGISTICS, LLC,	§	
JULIO RIOS, JEREMY GAMBOA,	§	
FERRELLGAS PARTNERS, L.P.,	§	
FERRELLGAS, L.P., BRIDGER	§	
ADMINISTRATIVE SERVICES II, LLC,	§	
BRIDGER MARINE, LLC, BRIDGER RAIL	§	
SHIPPING, LLC, BRIDGER REAL	§	
PROPERTY, LLC, BRIDGER STORAGE,	§	
LLC, BRIDGER SWAN RANCH, LLC,	§	
BRIDGER TERMINALS, LLC,	§	
BRIDGER TRANSPORTATION, LLC,	§	
BRIDGER ENERGY, LLC, BRIDGER	§	
LEASING, LLC, BRIDGER LAKE, LLC,	§	
J.J. LIBERTY, LLC,	§	
J.J. ADDISON PARTNERS, LLC	§	
	§	
Defendants.	§	

\* \* \* \* \*

REPORTER'S CERTIFICATION  
VIDEOCONFERENCE ORAL DEPOSITION OF  
JEREMY GAMBOA  
August 20, 2020

I, Suzanne Kelly, Certified Shorthand Reporter in  
and for the State of Texas hereby certify to the  
following:

That the witness, JEREMY GAMBOA, was duly sworn  
by the officer and that the transcript of the  
Videoconference Oral Deposition is a true record of  
the testimony given by the witness;

That the deposition transcript was submitted on  
the 1st day of September, 2020, to the witness for  
examination, signature and return to Suzanne Kelly by  
the 5th day of October, 2020;



1 That the amount of time used by each party at the  
2 deposition is as follows:

Ms. Quinn-Barabanov: Five hours and 54 minutes

3 Mr. Kramer: 30 minutes.  
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1 That pursuant to the information given to the  
2 deposition officer at the time said testimony was  
taken, the following includes counsel for all parties  
of record:

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4 Chris Han, Esq.  
Filberto Agusti, Esq.  
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25

1 I further certify that I am neither counsel for,  
2 related to, nor employed by any of the parties or  
3 attorneys in the action in which this proceeding was  
4 taken, and further that I am not financially or  
5 otherwise interested in the outcome of the action.  
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1 In witness whereof, I have this date subscribed my  
2 name on this 31st day of August, 2020.

3  
4 

5 Suzanne Kelly, CSR, RDR, CRR

Certification No. 1260

6 Expiration Date: 12-31-21

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